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Delivered by email to:

LinhThu Do@txs.uscourts.gov (7.45pm GMT + 1, May 8, 2018)

Anita Dolezel@txs.uscourts.gov

Mario Rios@txs.uscourts.gov

May 8, 2018

United States Courthouse
 United States Bankruptcy Court
 Southern District of Texas
 Houston Division
 515 Rusk Avenue
 Houston, TX 77002.

Attention: The Court Case Manager, and Court Relief Case Managers
Ms. LinhThu Do, Ms. Anita Dolezel and Mr Mario Rios

Dear Ms. LinhThu Do, Ms. Dolezel and Mr Rios,

NOTICE/ SERVICE OF AFFIDAVIT OF FACTS OF MR BOSAH OKONYIA, LEGAL OFFICER OF ZENITH BANK PLC IN RE ERIN CORPORATION'S VOLUNTARY PETITION UNDER CHAPTER 11 - CASE NUMBER: 18-32106.

We are Counsel to Zenith Bank Plc, a Secured Creditor of Erin Petroleum Nigeria Limited (both companies registered under the laws of the Federal Republic of Nigeria). Erin Petroleum Nigeria Limited, although a subsidiary of Erin Energy Corporation is a separate body corporate from the parent.

The existence of the above mentioned Petition and applications for interim and final orders before the Honorable Judge Marvin Isgur's Court has been brought to our attention by our client Zenith Bank Plc. Whilst our client is not a party to this petition, it is important to state that Zenith Bank Plc is a secured creditor of Erin Petroleum Nigeria Limited, one of the Debtors in the aforesaid petition.

Zenith Bank Plc, now vide the Affidavit of Mr. Bosah Okonyia (and the annexures thereto) deposed to at the High Court of Lagos State, today, May 8, 2018 presents before this Court, information and facts which are relevant to the due and fair consideration of the applications pending before the US Court; and which have/ may not have been brought before the court nor have been brought to the Court's attention prior to this time.

Dr M. Ajogwu, SAN, FCIArb; Professor F. Ajogwu, SAN, FCIArb; I. Imhanze, ACIArb (UK); C. Nwabulu; M. Echo; J. Fakulude, ACIArb (UK); C. Onuoma; M. Sowunmi; O. Ekweanya; T. Kachikwu; A. Adeniyi; K. Erhonsele; A. Odekunle; U. Umukoro; O. Olumide, ACIArb (UK); B. Osazuwa; A. Yusuf; N. Jo-Madugu; A. Okafor; O. Makinde; O. Nwosu; O. Olanrewaju; J. Iyoke; J. Nimpar; P. Udeh; G. Oyewole; E. Alasa; F. Fawehinmi; C. Ezeilo; G. Osoka

This serves therefore to request you LinhThu Do, Anita Dolezel and Mario Rios as Case Manager and Relief Case Manager respectively of this Court, or such other successor or other officer of the Court as may be competent by law to do so, to bring this Affidavit and its annexures, in the interest of justice, to the urgent attention of the Court before 0900 Hours (Houston, Texas time) on May 9, 2018; and to kindly confirm such to us by return mail.

Please accept our professional regards.

Yours sincerely,
FOR: KENNA PARTNERS



Charles Nwabulu, ACARB
Associate Partner

Enclosures/ Attachments

In copy to, and served on

1. **Erin Energy Corporation –** **lionel.mcbee@erinenergy.com**
AND
2. **Erin Energy Corporation's Attorneys**
and/ or Proposed Attorneys, David L. Curry Jr.
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Bridget Moore – **bmoore@okinadams.com**
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1113 Vine St. Suite 201, Houston, Texas 77002
Tel: 713.228.4100, Fax: 888.865.2118
3. **Erin Petroleum Nigeria Limited**
(Previously Known as "Camac Petroluem Ltd)
(Debtor to Zenith Bank Plc)
Attn: Mr Adefemi Sakiru Ayoade, CEO **FemiAyoade@erinenergy.com**
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